

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIBEL MOSES, on behalf of herself and all
others similar situated,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY,
d/b/a *The New York Times*,

Defendant,

Civil Action No. 1:20-cv-4658

**DEFENDANT THE NEW YORK
TIMES COMPANY’S NOTICE OF
MOTION AND MOTION TO
DISMISS**

Notice is hereby given that The New York Times Company’s (“NYT”) respectfully moves, pursuant to Fed. R. Civ. P. 12(b)(6), for dismissal of all claims asserted in Plaintiff’s Complaint because they fail to state claims upon which relief can be granted.

This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities and Request for Judicial Notice filed concurrently herewith, the pleadings and papers filed herein, the declaration of Kristen Rodriguez filed concurrently and in support of this Motion, and upon such other and further matters as may be presented to the Court.

[SIGNATURES ON THE FOLLOWING PAGE]

Dated: August 17, 2020

Respectfully submitted,

DENTONS US LLP

By: /s/ Sandra D. Hauser

Sandra D. Hauser
1221 Avenue of the Americas
New York, New York 10020
Phone: 212-768-6802
Email: sandra.hauser@dentons.com

Natalie J. Spears
Kristen C. Rodriguez
233 S. Wacker Drive, Suite 5900
Chicago, IL 60606
Phone: 312-876-8000
Email: natalie.spears@dentons.com
Email: kristen.rodriguez@dentons.com

*Attorneys for Defendant,
The New York Times Company*

CERTIFICATE OF SERVICE

I certify that on August 17, 2020 I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Sandra Hauser